

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

CIRCUIT CITY STORES, INC.,  
et al.,

Jointly Administered ,  
  
Debtors.

Chapter 11 Proceedings

Case No. 08-35653

Hon. Kevin Huennekens

**MOTION PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2) FOR  
ADMISSION *PRO HAC VICE***

Paul McCourt Curley (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, of Canfield | Baer LLP, hereby moves the Court to enter an Order permitting Gary H. Cunningham (the “Admittee”), a partner in the law firm of Giarmarco Mullins & Horton, PC, to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, to represent Carrollton Arms, LLC, pursuant to Local Bankruptcy Rule 2090-1(E)(2). In support of this Motion, Movant states as follows:

1. The Admittee is a member in good standing of the Bar of the State of Michigan, admitted to practice before all state courts in Michigan, the United States District Courts for the Eastern and Western Districts of Michigan, the United States Court of Appeals for the Federal Circuit and Sixth Circuit, and the United States Supreme Court. There are no disciplinary proceedings pending against the Admittee and the Admittee is familiar with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure and will become familiar with the local rules of this Court.

2. Movant requests that this Court grant this Motion so that the Admittee may file pleadings in accordance with local rule 2090-1(E)(2) and appear and be heard at hearings in these chapter 11 cases.

3. Pursuant to Local Bankruptcy Rule 9013(G), and because there are no novel issues of law presented in this Motion, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

WHEREFORE, Movant respectfully requests the Court to enter an Order filed simultaneously herewith, permitting the Admittee to appear *pro hac vice* in association with Movant as counsel for Carrollton Arms, LLC, in this chapter 11 case under the conditions set forth in paragraph 2, and (ii) granting such other further relief as is just.

By: /s/ Paul McCourt Curley  
Paul McCourt Curley, Esquire  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Gary H. Cunningham was served by first class mail and/or electronic means on this 26<sup>th</sup> day of November 2008 upon the following constituting all necessary parties:

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/s/ Paul McCourt Curley